

1 Michele R. Stafford, Esq. (SBN 172509)
Shivani Nanda (SBN 253891)
2 SALTZMAN & JOHNSON LAW CORPORATION
44 Montgomery Street, Suite 2110
3 San Francisco, CA 94104
Telephone: (415) 882-7900
4 Facsimile: (415) 882-9287
mstafford@sjlawcorp.com
5 snanda@sjlawcorp.com

6 Attorneys for Plaintiffs

7
8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 BAY AREA PAINTERS AND TAPERS
PENSION TRUST FUND, et al.,

11 Plaintiffs,

12 v.

13 REYES DRYWALL, INC. and DOES 1-10,
14 inclusive;

15 Defendant.

Case No.: C13-1752 EMC

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND MEDIATION COMPLETION
DEADLINE BY SIXTY DAYS**

16
17 The parties to this action hereby respectfully request and stipulate to extend the deadline to
18 hold the mediation session by 60 days. Good cause exists for the continuance, as follows:

19 1. On July 15, 2013, the Court ordered the parties to participate in mediation within
20 the presumptive deadline of ninety days. (Docket No. 15).

21 2. On August 12, 2013, ADR Clerk, Richard Wieking notified the parties that
22 Katherine Ritchey was the assigned mediator for this case. (Docket No. 19).

23 3. On August 19, 2013, the parties participated in a pre-mediation conference with
24 Ms. Ritchey and scheduled the mediation for October 14, 2013.

25 4. The parties are currently engaged in settlement discussions and are close to
26 resolving this matter. To avoid the time and expense of preparing for and attending mediation, the
27 parties agreed to cancel the October 14, 2013 mediation and continue informal settlement
28 discussions.

1 5. If the matter does not resolve informally, the parties have agreed to reschedule a
2 mediation session with Ms. Ritchey.

3 6. The parties therefore request that the Court extend the deadline to hold the
4 mediation session by 60 days.

5 Dated: October 15, 2013

**SALTZMAN & JOHNSON
LAW CORPORATION**

6
7 By: _____ /S/

8 Shivani Nanda
9 Attorneys for Plaintiffs

10 Dated: October 15, 2013

**LAW OFFICE OF
GEORGE R. GORE**

11
12 By: _____ /S/

13 George R. Gore
14 Attorney for Defendant

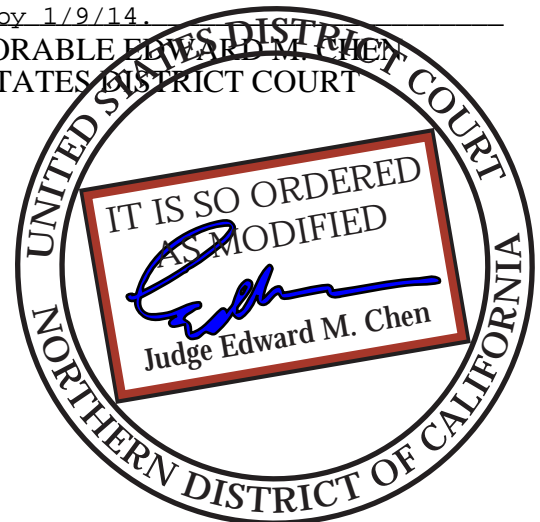
IT IS SO ORDERED.

15 The deadline to hold the mediation session is extended by sixty days to
16 12/15 _____, 2013. The CMC originally set for 11/7/13 is reset for

17 Date: 10/21/13 _____

1/16/14 at 10:30 a.m. An updated CMC statement
shall be filed by 1/9/14.

18 THE HONORABLE EDWARD M. CHEN
19 UNITED STATES DISTRICT COURT



ATTESTATION CERTIFICATE

In accord with the Northern District of California's General Order No. 45, Section X(B), I attest that concurrence in the filing of this document has been obtained from each of the other signatories who are listed on the signature page.

Dated: October 15, 2013

SALTZMAN & JOHNSON
LAW CORPORATION

By:

/S/

SHIVANI NANDA
Attorneys for Plaintiffs